



State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-3503 FAX (603) 271-5171



June 12, 2003

Dean Giffin  
Sanbornville Water Department  
PO Box 254  
Sanbornville, NH 03872-0254

**LETTER OF DEFICIENCY #WSEB 03-042**  
**CERTIFIED MAIL 7099 3400 0003 0691 1321**

Subject Wakefield Public Water System: Sanbornville Water Department (EPA# 2391010)

Dear Mr. Giffin

The records of the Department of Environmental Services (DES) show that Sanbornville Water Department water system (SWD) is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system serving 15 or more services, or 25 or more people for 60 or more days per year. As such, the water system owner is required to submit samples to the State laboratory or a State-certified laboratory for coliform bacteria analysis in compliance with NH Administrative Rule Env-Ws 325.

DES records show that the SWD has incurred five bacteria Maximum Contaminant Level (MCL) violations in the past two years. The MCL violations were incurred in May 2001, August 2002, September 2002, October 2002, and now in June 2003. Following the September 2002 violation, DES issued Letter of Deficiency #WSEB 02-135 (LOD) to the SWD, which requested the system to retain a consultant to address the bacteria contamination. The SWD complied with the LOD by having staff from Northeast Rural Water Association (NeRWA) examine the system and prepare a report listing recommendations to correct the existing bacteria contamination and to prevent future contamination. Among NeRWA's many recommendations were the development of a flushing program and a stand-by chlorination procedure for use during system maintenance and repair events.

On May 9, 2003, DES staff performed a triennial sanitary survey of the system. The sanitary report, dated May 27, 2003, again noted the need for the SWD to adopt a routine flushing program. In addition, the report urged the SWD to consider operating its chlorination facilities on a continuous basis. The report stated, "If bacterial water quality problems continue, continuous addition of chlorine may be required." Based on this month's MCL violation, it is clear that episodic use of chlorination does not provide consumers with a sufficient level of health protection.

In consideration of the above, DES believes the MCL violations can be corrected and future violations prevented by taking the following actions:

**By July 18, 2003, submit to DES for review and approval a comprehensive report and implementation schedule which details how the SWD will maintain a sufficient, continuous disinfectant/inactivation level within the water system to prevent bacteria contamination. At a minimum, the report should describe in detail:**

- The description, sizing calculation, required chemicals, and installation location of any treatment equipment/process to be installed.
- A written plan for operating and maintaining any treatment equipment/process.
- All measuring, control, communication, and alarm equipment associated with the treatment equipment/process.
- The target disinfectant/inactivation levels to be maintained.

The implementation schedule should clearly identify dates by which major milestones (e.g., purchase of equipment, installation, operational status, etc.) will be accomplished.

In the event compliance is not achieved within this period, DES may take further enforcement action, including issuing an order requiring the deficiencies be corrected, initiating an administrative fine proceeding and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

The copy of the requested written report **and implementation schedule** should be addressed as follows:

Alan Leach  
Department of Environmental Services  
Water Supply Engineering Bureau  
6 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095

Please contact Alan Leach by phone at (603) 271-2854, or by e-mail at [aleach@des.state.nh.us](mailto:aleach@des.state.nh.us) if you have any questions regarding this letter.

Sincerely,



**COPY**

Anthony P. Giunta, P.G., Administrator  
Water Supply Engineering Bureau

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cc: Gretchen Rule, DES Legal Unit  
Maurice O'Donnell, Town of Wakefield Health Officer  
David Tibbetts, Sampling Agent  
EPA Region I